

Attorney Docket No. 228077-001057 (P6077)

**REMARKS**

The present application stands with pending claims 1-30 where claims 1, 13, 15, 19, 22, 23, 26, 29 and 30 are independent. Applicant herein amends claims 1, 13, 15, 19, 22, 23, and 26 as recited in the appendices.

As a preliminary matter, Applicant thanks the Examiner for indication that claim 29 is allowable and claims 8-10 include allowable subject matter. Applicant added claim 30 as recited in the appendices to place claim 8 in independent form.

Claims 1, 3-7, 13, 15-20, 22 and 23-25 stand rejected under 35 U.S.C. §102(b) as being anticipated by Tietz (U.S. 3,218,785). In response, first Tietz does not disclose or suggest a female coupling as recited in claims 1, 13, 15, 19, 22, and 23. Instead, Tietz discloses an upper section 12 of a housing. This upper section 12 is a closed cap and in no way can be construed to be a coupling when reasonably defined. The Examiner appears to state that the pocket 32 for receiving projections 42 is itself a coupling. This is a completely unreasonably stretched definition of "coupling." A coupling as defined in the specification and as known to one skilled in the art refers to a piece or structure that couples things together such as a tube or pipe. In no way can an end cap 12 as shown in Tietz reasonably be called a coupling. To do so impermissibly ignores the fact that an obviousness rejection is required here with a showing by the Examiner that the upper section 12 of the housing in Tietz must first be modified to form a coupling to derive the female coupling of the present invention. Since no showing of this kind is made, Tietz does not disclose or suggest the female coupling. For this reason alone, Applicant respectfully requests that the §102(b)

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rejection of independent claims 1, 13, 15, 19, 22 and 23, and their depending claims 3-7, 14, 16-18, and 24-25 based on Tietz be withdrawn.

In addition, each of independent claims 1, 13, 15, 19, 22, and 23 as amended recite that the male coupling is metal. This amendment is included to emphasize that the polymeric female coupling must mate with a male coupling for fuel and radioactive settings and that the claimed configuration solves problems caused specifically by this metal to plastic connection. Tietz merely discloses that the housing pieces 12, 14 should be made of plastic and does not disclose or suggest a metal coupling connected to a polymeric coupling. For this additional reason, Applicant respectfully requests that the §102(b) rejection of independent claims 1, 13, 15, 19, 22 and 23, and their depending claims 3-7, 14, 16-18, and 24-25 based on Tietz be withdrawn.

Claims 1, 3-7, 13, 15-20, 22 and 23-28 stand rejected under 35 U.S.C. §102(b) as being anticipated by Terhune (U.S. 5,045,192). In response, Terhune also does not disclose or suggest using a metal coupling attached to a polymeric coupling. In fact, Terhune specifically teaches away from this design by using a plastic adapter 14 to attach a plastic filter 12, 38 to a metal tank 16, 18. Terhune teaches the plastic adapter 14 should be used instead of a male metal coupling as recited in claims 1, 13, 15, 19, 22, 23 and 26. To change the material, which is one of the important teachings of the invention, is to destroy part of the function and teaching of Terhune, which is impermissible. For this additional reason, Applicant respectfully requests that the §102(b) rejection of independent claims 1, 13, 15, 19, 22, 23 and 26, and their depending claims 3-7, 14, 16-18, 24-25 and 27-28 based on Terhune be withdrawn.

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Claims 1, 3-6-11-13, 15-20, 22 and 23-28 stand rejected under 35 U.S.C. §102(b) as being anticipated by Petrucci et al. (EP 0 231 862). In response, Applicant first traverses because Petrucci is not in an analogous field as the present invention. The present invention, as now recited in the claims, is directed to the field of fuels and radioactive materials where it is dangerous to expose such materials to humans, and therefore the time for coupling and uncoupling is critical. In contrast, Petrucci is merely related to the beverage or soda field. No fossil fuel or nuclear plant engineer would think to look toward the beverage industry to determine a coupling design.

In addition, Petrucci merely discloses connection between a plastic canister 14 and a plastic head 12. It does not disclose or suggest a male metal coupling attached to a polymeric female coupling as recited in the claims. For these reasons, Applicant respectfully requests that the §102(b) rejection of independent claims 1, 13, 15, 19, 22, 23 and 26, and their depending claims 3-7, 14, 16-18, 24-25 and 27-28 based on Petrucci be withdrawn.

Claims 2, 14 and 21 stand rejected under 35 U.S.C. §103 as being unpatentable over Terhune in view of Mansfield (U.S. 3,760,951). In response, Applicant respectfully traverses by repeating the arguments from above to overcome the §102(b) rejection of Petrucci and expands them to include Mansfield. Specifically, Petrucci is not from the fuel and radioactive arts as discussed above and neither is Mansfield. Mansfield merely discloses a filter for water and has nothing to do with technology or arts, such as fuels or radioactive materials, that are dangerous to humans. For this reason alone, Applicant respectfully requests that the §103 rejection of claims 2, 14 and 21 be withdrawn.

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In addition, Mansfield also does not disclose a metal or stainless steel male coupling. Instead, Mansfield discloses a plastic sleeve 18 with only metal pins and never specifically mentions stainless steel as the metal (col. 3, lines 27-30 of Mansfield). This does not disclose or suggest a metal or stainless steel male coupling that is required in the fuel and radioactive arts. For this additional reason, Applicant respectfully requests that the §103 rejection of claims 2, 14 and 21 be withdrawn.

Finally, no motivation exists to modify the structure of Petrucci with the teachings of Mansfield. The Examiner cannot just state that Mansfield teaches the materials of the couplings and ignore the remaining teachings of Mansfield. The Examiner must look to all that Mansfield teaches. Accordingly, Petrucci teaches a single piece top 56 with integrally formed tabs 58, 60. Nothing exists in the two references to teach how the tabs 58, 60 in Petrucci can be made of metal as in Mansfield while the remainder of the top 56 in Petrucci is plastic. Nor can it be seen how the particular structure in Petrucci can be changed so that the tabs 58, 60 extend inward instead of outward as in Mansfield. No motivation exists to combine Petrucci and Mansfield by modifying Petrucci with at least these teachings of Mansfield. For this additional reason, Applicant respectfully requests that the §103 rejection of claims 2, 14 and 21 be withdrawn.

The Director is hereby authorized to charge any fees associated with the filing of this Amendment to Deposit Account No. 18-2284 of Piper Rudnick, duplicate copy attached.

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For all of the above reasons, Applicant requests reconsideration and allowance of all of the pending claims. The Examiner should contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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